

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

*Plaintiff,*

-against-

SEAN COMBS,  
JUSTIN DIOR COMBS,  
CUBA GOODING JR.,  
LUCIAN CHARLES GRAINGE,  
KRISTINA KHORRAM,  
LOVE RECORDS,  
MOTOWN RECORDS,  
UNIVERSAL MUSIC GROUP,  
COMBS GLOBAL ENTERPRISES,  
JOHN and JANE DOES 1-10 and  
ABC CORPORATIONS. 1-10,  
*Defendants.*

Case No.: 24-cv-01457

**NOTICE OF MOTION**

**NOTICE OF MOTION FOR LEAVE TO SERVE BY PUBLICATION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Tyrone A. Blackburn, Esq., and exhibits attached thereto, Plaintiff Rodney Jones will move this Court, before the Honorable J. Paul Oetken, U.S.D.J., at the United States Courthouse, 40 Foley Square, New York, NY, on a date and time to be determined, for an order:

1. Authorizing service of the summons and Second Amended Complaint on Defendants Cuba Gooding Jr. and Justin Dior Combs by publication in the New York Times and Los Angeles Times once per week for four consecutive weeks; and
2. Granting such further relief as the Court deems just and proper.

Dated: April 7, 2025  
Brooklyn, New York

/s/ Tyrone A. Blackburn, Esq.  
Tyrone A. Blackburn, Esq.  
1242 East 80th Street, 3rd Floor  
Brooklyn, NY 11236  
tblackburn@tablackburnlaw.com  
*Attorneys for Plaintiff Rodney Jones*